## ORIGINAL

## TRANS OCEAN INTERNATIONAL LTD.

T. 0. I. L.

20 NORTH CENTRAL AVENUE VALLEY STREAM, NY 11580 TEL: 516-872-5584 FAX: 775-860-9010 or 516-872-5593

August 19, 2003

Honorable Bryant L. Van Brakle Secretary Federal Maritime Commission 800 North Capitol Street, N. W. Washington, D.C., 20573

Re: Petition of National Customs Brokers and Forwarders Association of America, Inc. for a Limited Exemption From Certain Tariff Requirements of the Shipping Act of 1984 Petition No. **03**-

Dear Secretary Van Brakle:

I am Samuel Perez, Ocean Export Manager for Trans Ocean International Ltd., dba T.O.I.L., nvocc **licence** No. **14942N**, having one (1) **office** in the port of New York.

Following are approximate costs incurred by our company in maintaining a tariff:

- 1. Establishing a website; Nil
- 2. The annual cost of subscribing to a tariff publishing service; \$1,500.00
- 3. The approximate number of hours and costs spent each month in making changes to tariff; Seven (7)
- 4. These costs are absorbed by our company, T.O.I.L.
- 5. Our company is not able to track the number of times shippers or other persons have accessed our tariff.
- 6. The estimated percentage of our company's costs that are related directly or indirectly to rate tariff compliance: \$3,750.00
- 7. Rates are negotiated prior to shipment and only filed upon booking.

Finally, filing of rates are of no use to our company since our clients do not visit any **websites** for price comparisons. Instead, shopping around is performed by means of telephone and/or e-mail. Thus, rates are filed merely to comply with FMC requirements.

Furthermore, it is a costly exercise, especially for a relatively small nvocc such as ours.

I, Samuel Perez, declare under penalty of perjury that the foregoing is true and correct. Furthermore, I **certify** that I am qualified and authorized to tile the verified statement.

Executed on August 19th, 2003

Samuel Perez, Ocean Export Manager 30 40

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